

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

KATHRYN REITZ,)	
)	
Plaintiff,)	CASE NO: 3:08-cv-00728
)	
v.)	HON. ALETA A. TRAUGER
)	
CITY OF MT. JULIET,)	JURY DEMANDED
)	
Defendant.)	

PLAINTIFF'S MOTION TO COMPEL

Plaintiff Kathryn Reitz, by counsel, moves this Court for an order compelling the Defendant to produce documents identified as Nos. 3-27 and 28-51 on the Defendant's Privilege Log, a copy of which is attached to the memorandum filed in support as Exhibit 2. Defendant has waived its attorney client and work product privileges as to those documents, and defendant's counsel has refused plaintiff's counsel's request for production. In support of her motion, Plaintiff relies on the concurrently filed Memorandum of Law and exhibits.

Respectfully submitted,

/s/ Richard J. Braun

Richard J. Braun, Esq. No. 010346
BRAUN & ASSOCIATES, PLLC
501 Union Street
Suite 500
Nashville, TN 37219
Tel: (615) 259-1550

/s/ Joseph A. Davidow

Joseph A. Davidow No. 027176
501 Union Street
Suite 502
Nashville, TN 37219
Tel: (615) 256-3605

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been sent via the Electronic Filing System to the following on this the 23rd day of December, 2009.

Daniel H. Rader, III, Esq.
Richard L. Moore, Esq.
MOORE, RADER, CLIFT & FITZPATRICK, P.C.
P.O. Box 3347
Cookeville, TN 38502

/s/ Richard J. Braun

Richard J. Braun, Esq.